

UNITED STATES DISTRICT COURT

DISTRICT OF DELAWARE

JAMES M. BAKER, On Behalf of Himself)	Civil Action No. 1:05-cv-00272-GMS
and All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
ROCHELLE PHILLIPS, On Behalf of)	Civil Action No. 1:05-cv-00277-GMS
Herself and All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	

[Caption continued on following page.]

THE CITY OF DEERFIELD BEACH'S RESPONSE TO THE COMPETING
MOTIONS FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND
FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL

JULY 21, 2005

ROBERT WILKINS, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 1:05-cv-00287-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
LEONARD BRONSTEIN, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00289-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
GREG PENN,)	Civil Action No. 1:05-cv-00293-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
CLIFFORD W. JONES, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00316-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
)	


[Caption continued on following page.]

MICHAEL D. BLUM,)	Civil Action No. 1:05-cv-00372-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
<hr/> THOMAS J. CUSSEN, On Behalf of Himself)	Civil Action No. 1:05-cv-00389-GMS
and All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
<hr/>)	

Institutional Investor City of Deerfield Beach Non-Uniform Employees Retirement Plan ("City of Deerfield Beach") respectfully submits this response to the competing motions for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead and Liaison Counsel filed on July 5, 2005. Upon review of the competing motions, based on the data submitted to the Court, it appears that Activest PT-Master & Activest Enerfonds has the largest financial interest of the proposed lead plaintiffs. If the Court determines that the motion of Activest PT-Master & Activest Enerfonds is deficient in any way, City of Deerfield Beach is ready, willing and capable to perform the duties of lead plaintiff.

DATED: July 21, 2005

ROSENTHAL, MONHAIT, GROSS
& GODDESS, P.A



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Counsel for City of Deerfield Beach

CERTIFICATE OF SERVICE


I hereby certify that on July 21, 2005, I electronically filed The City Of Deerfield Beach's Response To The Competing Motions For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead And Liaison Counsel, using CM/ECF, which will send notification of such filing to the following:

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I further certify that on July 21, 2005, I have caused the above-listed documents to be sent by first-class mail to all additional counsel on the attached service list.



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